

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

SUMMONS

-----X
ELLIOTT ROMAN,

Plaintiff,

-against-

ARCHDIOCESE OF NEW YORK, CHURCH OF OUR
LADY QUEEN OF ANGELS and OUR LADY QUEEN
OF ANGELS ELEMENTARY SCHOOL,

Defendant.
-----X

Plaintiff(s) designate
NEW YORK County as the
place of trial.

The basis of the venue is
Plaintiff's residence

Plaintiff(s) reside at
1309 5th Avenue, Apt. 23D
New York, NY 10029

Index No.:
Date Summons &
Complaint Filed:

To the above named Defendant(s)

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Port Washington, NY
September 12, 2019


By: Brett Zekowski
Parker Waichman LLP
Office & Post Office Address:
6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500
Our File # 9006595

TO: Archdiocese of New York: 1101 First Avenue, New York, NY 10022

Church of Our Lady Queen of Angels: 228 East 113th Street, New York, NY 10029

Church of Our Lady Queen of Angels: c/o Archdiocese of New York: 1101 First Avenue,
New York, NY 10022

Our Lady Queen of Angels Elementary School: 229 East 112th Street, New York, NY 10029

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK-----X
ELLIOTT ROMAN,

Plaintiff,

-against-

ARCHDIOCESE OF NEW YORK, CHURCH OF OUR
LADY QUEEN OF ANGELS and OUR LADY QUEEN
OF ANGELS ELEMENTARY SCHOOL,Defendants.
-----X**VERIFIED COMPLAINT**

Index No.:

Jury Trial Demanded

Plaintiff, Elliott Roman, by his attorneys Parker Waichman LLP, complaining of the defendants, respectfully alleges, on personal knowledge as to himself and on information and belief as to all other matters, as follows:

1. At the time of the commencement of this action plaintiff, Elliott Roman, was a resident of the County of New York, State of New York.
2. At the time of the incident(s) giving rise to this complaint, plaintiff was a resident of the County of New York, State of New York.
3. This action is timely pursuant to CPLR 214-g.
4. At all times herein mentioned, defendant Archdiocese of New York, was a religious corporation organized pursuant to the Religious Corporations Law, with its principal office at 1011 First Avenue, New York, New York, in the County and State of New York.
5. At all times herein mentioned, defendant, Church of Our Lady Queen of Angels, was a religious corporation organized pursuant to the Religious Corporations Law with its principal office at 228 East 113th Street, New York, New York, in the County and State of New York.

6. At all times herein mentioned, defendant, Our Lady Queen of Angels Elementary School, was a religious corporation organized pursuant to the Religious Corporations Law with its principal office at 229 East 112th Street, New York, New York, in the County and State of New York.

7. At all times herein mentioned, defendant, Church of Our Lady Queen of Angels, was within and under the authority of defendant, Archdiocese of New York.

8. At all times herein mentioned, defendant, Archdiocese of New York, oversaw, managed, controlled, directed and operated defendant, Church of Our Lady Queen of Angels.

9. At all times herein mentioned, defendant, Our Lady Queen of Angels Elementary School, was within and under the authority of defendant, Archdiocese of New York.

10. At all times herein mentioned, defendant, Our Lady Queen of Angels Elementary School, was a Roman Catholic elementary school located at 229 East 112th Street, New York, New York, in the County and State of New York.

11. At all times herein mentioned, defendant, Archdiocese of New York, oversaw, managed, controlled, directed and operated defendant, Our Lady Queen of Angels Elementary School.

12. At all times herein mentioned, defendant, Church of Our Lady Queen of Angels, oversaw, managed, controlled, directed and operated defendant, Our Lady Queen of Angels Elementary School.

13. At all times herein mentioned, defendant, Archdiocese of New York, managed, supervised and controlled those who were employed or otherwise worked for defendant, Our Lady Queen of Angels Elementary School, including, but not limited to priests, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, Our Lady Queen of Angels Elementary School.

14. At all times herein mentioned, defendant, Church of Our Lady Queen of Angels, managed, supervised and controlled those who were employed or otherwise worked for defendant, Our Lady Queen of Angels Elementary School, including, but not limited to priests, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, Our Lady Queen of Angels Elementary School.

15. At all times herein mentioned, defendant, Our Lady Queen of Angels Elementary School, managed, supervised and controlled those who were employed or otherwise worked for defendant, Our Lady Queen of Angels Elementary School, including, but not limited to priests, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, Our Lady Queen of Angels Elementary School

16. From on or about January 1, 1987 through on or about December 31, 1992, plaintiff, Elliott Roman, an infant, attended defendant, Our Lady Queen of Angels Elementary School.

17. At all times herein mentioned and relevant to the allegations set forth herein "John Doe" was a priest assigned to defendant, Our Lady Queen of Angels Elementary School by defendant, Archdiocese of New York.

18. At all times herein mentioned and relevant to the allegations set forth herein "John Doe" was a priest assigned to defendant, Our Lady Queen of Angels Elementary School by defendant, Church of Our Lady Queen of Angels.

19. At all times herein mentioned and relevant to the allegations set forth herein "John Doe" was a priest assigned to defendant, Our Lady Queen of Angels Elementary School by defendant, Our Lady Queen of Angels Elementary School.

20. At all times herein mentioned, "John Doe", was employed by the defendant, Archdiocese of New York.

21. At all times herein mentioned, "John Doe", was employed by the defendant, Church of Our Lady Queen of Angels.

22. At all times herein mentioned, "John Doe", was employed by the defendant, Our Lady Queen of Angels Elementary School.

23. Through his position with defendant, Archdiocese of New York, "John Doe", was put in direct contact with plaintiff, Elliott Roman, then an infant.

24. Through his position with defendant, Church of Our Lady Queen of Angels, "John Doe", was put in direct contact with plaintiff, Elliott Roman, then an infant.

25. Through his position with defendant, Our Lady Queen of Angels Elementary School, "John Doe", was put in direct contact with plaintiff, Elliott Roman, then an infant.

26. That on or about January 1, 1987 through on or about December 31, 1992, "John Doe" sexually abused the plaintiff, Elliott Roman, then an infant.

27. At all times herein mentioned, "John Doe", was under the management, supervision, employ, direction and/or control of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School.

28. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, knew and/or reasonably should have known and/or knowingly condoned and/or covered up, the inappropriate and unlawful sexual activities of "John Doe", who sexually abused the plaintiff, Elliott Roman while plaintiff, Elliott Roman was an infant.

29. Defendant, Archdiocese of New York, had the responsibility to manage, supervise, control and/or direct priests assigned to defendant, Our Lady Queen of Angels Elementary School.

30. Defendant, Church of Our Lady Queen of Angels, had the responsibility to manage, supervise, control and/or direct priests assigned to defendant, Our Lady Queen of Angels

Elementary School.

31. Defendant, Our Lady Queen of Angels Elementary School, had the responsibility to manage, supervise, control and/or direct priests assigned to defendant, Our Lady Queen of Angels Elementary School.

32. At all relevant times, defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, had a duty not to aid pedophiles such as "John Doe", by assigning, maintaining and/or appointing him to positions in which he would have access to minors.

33. At all relevant times, "John Doe", used his position as a priest and/or employee to entice, take control of plaintiff, Elliott Roman, and sexually assaulted, sexually abused or have sexual contact with plaintiff, Elliott Roman while plaintiff was a minor.

34. Defendants, individually, jointly and/or severally, violated various New York statutes, including, but not limited to N.Y. Soc. Serv. Law §§413 and 420, which require school officials and teachers to report suspected cases of child abuse and impose liability for failure to report.

35. Plaintiff, Elliott Roman, suffered physical and psychological injuries and damages as a result of his childhood sexual abuse by "John Doe".

36. As a direct result of defendants' conduct, plaintiff, Elliott Roman, suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and physical manifestations of emotional distress. As a result of his childhood sexual abuse, plaintiff, Elliott Roman, has been prevented from obtaining the full enjoyment of life, has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling and has incurred and will continue to incur loss of income and/or loss of earning capacity.

37. Because of his childhood sexual abuse, plaintiff, Elliott Roman, is unable to fully

describe all of the details of that abuse and the extent of the harm that he suffered as a result.

**AS AND FOR A FIRST CAUSE OF ACTION
NEGLIGENT HIRING, RETENTION, SUPERVISION AND/OR DIRECTION**

38. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 37 as if fully set forth herein.

39. The sexual abuse of children by adults, including priests and teachers, is foreseeable.

40. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, at all relevant times represented and held out to the public that defendant, Our Lady Queen of Angels Elementary School, to be a safe place for learning and participating in youth activities.

41. At all relevant times, defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were each under an express and/or implied duty to protect and care for plaintiff, Elliott Roman.

42. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, negligently hired, retained, directed and supervised "John Doe", because they knew or should have known that "John Doe", posed a threat of sexual abuse of children such as plaintiff, Elliott Roman.

43. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, knew or should have known that "John Doe", had a propensity to engage in the conduct which caused plaintiff Elliott Roman's injuries prior to or about the time of the occurrence of these injuries.

44. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, owed a duty of care to all minors, including

plaintiff, Elliott Roman, who were likely to come under the influence or supervision of “John Doe”, in his role as teacher, priest, counselor, trustee, director, officer, employee, agent, servant and/or volunteer to ensure that “John Doe”, did not use their assigned positions to injure minors by sexual assault, sexual abuse or sexual contact with minors.

45. “John Doe”, sexually assaulted, sexually abused and/or had sexual contact with plaintiff, Elliott Roman on defendants’ premises, including defendants Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School.

46. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were put on notice of “John Doe’s improper and inappropriate actions toward minors.

47. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were negligent in failing to properly supervise “John Doe”.

48. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were negligent in failing to properly manage “John Doe”.

49. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were negligent in failing to properly control “John Doe”.

50. At all relevant times, defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were willful, wanton, malicious, reckless and/or outrageous in their disregard for the rights and safety of plaintiff, Elliott Roman.

51. As a direct and proximate result of defendants’ above described omissions,

plaintiff, Elliott Roman, has suffered and will continue to suffer the injuries described herein.

52. By reason of the foregoing, the defendants are liable to plaintiff jointly, severally and/or in the alternative, for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION
NEGLIGENCE/GROSS NEGLIGENCE**

53. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 52 as if fully set forth herein.

54. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, knew or negligently failed to know that "John Doe" posed a threat of sexual abuse to children.

55. The acts of "John Doe" as described above, were undertaken, enabled by, and/or during the course of his respective employment, assignment, appointment and/or agency with defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School.

56. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School:

- a. gave improper or ambiguous orders or failed to make proper regulations,
and/or employed improper persons in work involving risk of harm to others;
- b. failed to adequately supervise the activities of "John Doe";
- c. failed to adequately supervise and safeguard minors attending defendant, Our Lady Queen of Angels Elementary School;
- d. permitted and/or intentionally failed and/or neglected to prevent negligent or

tortious conduct by persons, whether or not their servants, agents or employees, upon premises under their control; and

- e. allowed the acts of omission and/or commission of any or all of the allegations set forth in this Complaint to occur.

57. At all relevant times, "John Doe", was under the supervision, employ, direction and/or control of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School.

58. At all relevant times, defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were wanton, willful, malicious, reckless and outrageous in their disregard for the rights and safety of plaintiff, Elliott Roman, which conduct was equivalent to criminal conduct.

59. As a direct and/or indirect result of said conduct, plaintiff, Elliott Roman, has suffered injuries and damages as described herein.

60. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

THIRD CAUSE OF ACTION BREACH OF FIDUCIARY DUTY

61. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 60 as if fully set forth herein.

62. At all relevant times, there existed a fiduciary relationship of trust, confidence, and reliance between plaintiff, Elliott Roman, on the one hand. and defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School,

on the other, based upon the entrustment of plaintiff, Elliott Roman, while he was a minor child, to the care and supervision of the defendants and each of them, as a student, parishioner, worshiper, invitee, attendee or guest at defendant, Church of Our Lady Queen of Angels, and as a student, invitee, attendee or guest at defendant, Our Lady Queen of Angels Elementary School. The entrustment of the plaintiff, Elliott Roman, to the care and supervision of the defendants and each of them, while plaintiff, Elliott Roman, was a minor child, required the defendants to assume a fiduciary role and to act in the best interests of the plaintiff and to protect him while he was a minor and vulnerable child.

63. Pursuant to their fiduciary relationship with plaintiff, Elliott Roman, defendants were entrusted with the well-being, care and safety of plaintiff, Elliott Roman.

64. Pursuant to their fiduciary relationship with plaintiff, Elliott Roman, defendants assumed a duty to act in the best interests of plaintiff, Elliott Roman.

65. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, breached their fiduciary duties to plaintiff, Elliott Roman.

66. At all relevant times, the actions and/or inactions of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were willful, malicious, wanton, reckless and outrageous in their disregard for the rights and safety of plaintiff, Elliott Roman.

67. As a direct result of defendants' conduct, plaintiff, Elliott Roman has suffered injuries and damages described herein.

68. By reason of the foregoing, Defendants, jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have

jurisdiction.

**FOURTH CAUSE OF ACTION
BREACH OF NON-DELEGABLE DUTY**

69. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 68 as of fully set forth herein.

70. When he was a minor, plaintiff, Elliott Roman was placed in the care of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, for the purposes of providing plaintiff, Elliott Roman, with a safe environment in which to participate in youth activities and receive an education. There was thus created a non-delegable duty of trust between plaintiff, Elliott Roman, and defendants.

71. Plaintiff, Elliott Roman, was a vulnerable child when placed in the care of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School.

72. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, and each of them, were in the best position to prevent plaintiff, Elliott Roman, from being abused and/or to have learned of the repeated abuse by "John Doe", and to have stopped it.

73. As evidenced by the fact that plaintiff, Elliott Roman was sexually abused as a minor child entrusted to the care of the defendants, these defendants breached their non-delegable duty to plaintiff, Elliott Roman.

74. At all relevant times, "John Doe", was under the supervision, employment, direction and/or control of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School.

75. As a result of the sexually abusive conduct of "John Doe", plaintiff, Elliott Roman

suffered the injuries and damages described herein, the full extent of which is unknown at present.

76. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**FIFTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

77. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 76 above as if set forth at length herein.

78. As described above, defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, acted in a negligent and/or grossly negligent manner.

79. The actions of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, endangered plaintiff, Elliott Roman's safety and caused him to fear for his own safety.

80. As a direct and proximate result of the actions of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, which included, but were not limited to, negligent and/or grossly negligent conduct, plaintiff, Elliott Roman, suffered severe injuries and damages as described herein, including, but not limited to, mental and emotional distress.

81. By reason of the foregoing, Defendants, jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**SIXTH CAUSE OF ACTION
BREACH OF DUTY *IN LOCO PARENTIS***

82. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 81 as if set forth at length herein.

83. While he was a minor, plaintiff, Elliott Roman, was entrusted by his parents to the control of the defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, for the purposes of providing plaintiff, Elliott Roman, with an education and allowing him to participate in youth activities sponsored by defendants. During the times that plaintiff, Elliott Roman, was at school and during the times that he participated in youth activities, he was under the supervision and control of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School. These defendants, and each of them, at all relevant times and now, owed and owe a duty to children entrusted their care to act *in loco parentis* and to prevent foreseeable injuries.

84. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, breached their duty to act *in loco parentis*.

85. At all relevant times the actions of defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, were willful, malicious, wanton, reckless, negligent, grossly negligent and/or outrageous in their disregard for the rights and safety of plaintiff, Elliott Roman.

86. As a direct result of defendants' conduct, plaintiff, Elliott Roman, has suffered the injuries and damages described herein.

87. By reason of the foregoing, defendants jointly, severally and/or in the alternative, are liable to plaintiff for compensatory damages, and for punitive damages, together with interest

and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**SEVENTH CAUSE OF ACTION
BREACH OF STATUTORY DUTY PURSUANT TO NEW YORK
SOCIAL SERVICES LAW §§ 413, 420 TO REPORT ABUSE**

88. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 87 as if fully set forth herein.

89. Pursuant to N.Y. Social Services Law §§413, 420, defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, had a statutory duty to report the reasonable suspicion of abuse of children in their care.

90. Defendants, Archdiocese of New York, Church of Our Lady Queen of Angels and Our Lady Queen of Angels Elementary School, breached that duty by knowingly and willfully failing to report reasonable suspicion of abuse by “John Doe” of children in their care.

91. As a direct and/or indirect result of said conduct, plaintiff, Elliott Roman, has suffered injuries and damages as described above.

92. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff, Elliott Roman, for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, plaintiff, Elliott Roman, demands judgment against defendants on each cause of action as follows:

- A. Awarding compensatory damages in an amount to be proven at trial, but in any event in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction;
- B. Awarding punitive damages to the extent permitted by law;

- C. Awarding prejudgment interest to the extent permitted by law;
- D. Awarding costs and fees of this action, including attorneys' fees, to the extent permitted by law;
- E. Awarding such other and further relief as to this Court may seem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Dated: Port Washington, New York
September 12, 2019

Yours, etc.



Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
Office & Post Office Address
6 Harbor Park Drive
Port Washington, NY 11050
516-466-6500
Our File # 9006595

[illegible]

Brett A. Zekowski, an attorney and counselor at law, duly admitted to practice in the Courts of the State of New York, affirms the following to be true under penalties of perjury:

I am an associate of the firm **Parker Waichman LLP** attorneys for the plaintiff(s) herein.

I have read the foregoing SUMMONS AND COMPLAINT, and know the contents thereof. Upon information and belief, I believe the matters alleged therein to be true.

The source of your deponent's information and the grounds of my belief are communications, papers, reports and investigations contained in my file.

The reason this verification is made by deponent and not by plaintiff(s) is that plaintiff(s) reside in a county other than the one in which your deponent's office is maintained.

Dated: Port Washington, NY
September 12, 2019


Brett A. Zekowski

Index No.

SUPREME COURT OF THE STATE OF NEW YORK
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Plaintiff(s)

-against-

ARCHDIOCESE OF NEW YORK, CHURCH OF OUR LADY
QUEEN OF ANGELS and OUR LADY QUEEN OF ANGELS
ELEMENTARY SCHOOL,

Defendant(s).

SUMMONS AND VERIFIED COMPLAINT

Certification per 22NYCRR §130-1.1a


Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500

To:
Attorney(s) for

Service of a copy of the within is hereby admitted.

Dated:
Attorney(s) for

PLEASE TAKE NOTICE

NOTICE OF

ENTRY that the within is a (certified) true copy of a entered in the office of the Clerk of the within named
Court on .

NOTICE that an Order of which the within is a true copy will be presented to the Hon. , one of the
OF

SETTLEMENT judges of the within named Court, at ,
, on
, at M.

Dated:

Parker Waichman LLP
Attorneys for Plaintiff(s)

TO: